

# **EXHIBIT D**



National Institutes of Health  
Office of Extramural Research

March 10, 2025

Angela V. Olinto, Ph.D.  
Provost, Columbia University  
Email: [provost@columbia.edu](mailto:provost@columbia.edu)

Dear Dr. Olinto:

NIH is hereby providing notice that funding for the projects in the attached spreadsheet will be terminated pursuant to the National Institutes of Health ("NIH") Grants Policy Statement (GPS),<sup>1</sup> and 2 C.F.R. § 200.340(a)(4).

As reflected in the Notices of Award for the most recent budget period of these projects, the NIH Grants Policy Statement is incorporated as a term and condition of award. The GPS "includes the terms and conditions of NIH grants and cooperative agreements and is incorporated by reference in all NIH grant and cooperative agreement awards."<sup>2</sup> According to the GPS, "NIH may ... terminate the grant in whole or in part as outlined in 2 CFR Part 200.340."<sup>3</sup> At the time the Notices of Award were issued for the most recent budget period, 2 C.F.R. § 200.340(a)(4) permitted termination "[b]y the Federal awarding agency or pass-through entity, to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities."

These awards no longer effectuate agency priorities. NIH is obligated to carefully steward grant awards to ensure taxpayer dollars are used in ways that benefit the American people and improve their quality of life. Your project does not satisfy these criteria.

NIH is responsible for ensuring that its limited resources are appropriately allocated. NIH policy is that grant dollars should support institutions that foster safe, equal, and healthy working and learning conditions conducive to high-quality research and free inquiry<sup>4</sup>—and should not subsidize institutions that are not built on American values of free speech, mutual respect, and open debate. In this vein, NIH is aware of recent events at Columbia University involving antisemitic action that suggest the institution has a disturbing lack of concern for the safety and wellbeing of Jewish students. Columbia's ongoing inaction in the face of repeated and severe harassment and targeting of Jewish students has ground day-to-day campus operations to a halt, deprived Jewish students of learning and research opportunities to which they are entitled, and brought shame upon the University and our nation as a whole. Supporting research in such an

---

<sup>1</sup> <https://grants.nih.gov/grants/policy/nihgps/nihgps.pdf>.

<sup>2</sup> NIH GPS, Section 3.

<sup>3</sup> *Id.* at Section 8.5.2.

<sup>4</sup> NIH GPS, Section 4.

environment is plainly inconsistent with NIH's priorities and *raison d'être* of funding and championing the very best American research and educational institutions.

Although "NIH generally will suspend (rather than immediately terminate) a grant and allow the recipient an opportunity to take appropriate corrective action before NIH makes a termination decision,"<sup>5</sup> no corrective action is possible here. The actions described above are incompatible with agency priorities, and no modification of the projects could align the projects with agency priorities.

Costs resulting from financial obligations incurred after termination are not allowable.<sup>6</sup> Nothing in this notice excuses either NIH or you from complying with the closeout obligations imposed by 2 C.F.R. §§ 200.344. NIH will provide any information required by the Federal Funding Accountability and Transparency Act or the Office of Management and Budget's regulations to *USAspending.gov*.<sup>7</sup>

### Administrative Appeal

You may object and provide information and documentation challenging these terminations. NIH has established a first-level grant appeal procedure that must be exhausted before you may file an appeal with the Departmental Appeals Board.<sup>8</sup>

You must submit a request for such review to Director Memoli no later than 30 days after this letter is received, except that if you show good cause why an extension of time should be granted, Dr. Memoli may grant an extension of time.<sup>9</sup>

The request for review must include a copy of this decision, must identify the issue(s) in dispute, and must contain a full statement of your position with respect to such issue(s) and the pertinent facts and reasons in support of your position. In addition to the required written statement, you shall provide copies of any documents supporting your claim.<sup>10</sup>

Sincerely,

Michelle G. Bulls -S

Digitally signed by Michelle G.  
Bulls -S  
Date: 2025.03.10 16:01:39 -04'00'

Michelle G. Bulls  
Director, Office Policy for Extramural Administration  
Chief Grants Management Officer - National Institutes of Health  
Email: [michelle.bulls@nih.gov](mailto:michelle.bulls@nih.gov)

cc:

William Berger, Assistant Vice President for Sponsored Projects Administration, Columbia University

<sup>5</sup> NIH GPS, Section 8.5.2.

<sup>6</sup> See 2 C.F.R. § 200.343.

<sup>7</sup> 2 C.F.R. § 200.341(c).

<sup>8</sup> See 42 C.F.R. Part 50, Subpart D.

<sup>9</sup> *Id.* § 50.406(a).

<sup>10</sup> *Id.* § 50.406(b).